

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

GODO KAISHA IP BRIDGE 1,

Plaintiff,

vs.

**TELEFONAKTIEBOLAGET LM
ERICSSON AND ERICSSON INC.,**

Defendants.

**Civil Action No. 2:21-cv-213
(Lead Case)**

JURY TRIAL DEMANDED

GODO KAISHA IP BRIDGE 1,

Plaintiff,

vs.

**NOKIA CORPORATION, NOKIA SOLUTIONS
AND NETWORKS OY, AND NOKIA OF
AMERICA CORPORATION,**

Defendants.

**Civil Action No. 2:21-cv-215
(Member Case)**

JURY TRIAL DEMANDED

**ERICSSON’S UNOPPOSED PARTIAL MOTION TO DISMISS ALLEGATIONS
RELATED TO THE ’546, ’275, AND ’594 PATENTS**

Telefonaktiebolaget LM Ericsson and Ericsson Inc., (“Ericsson”) move the court to dismiss Godo Kaisha IP Bridge 1 (“IP Bridge”)’s claims of infringement as to U.S. Pat. Nos. 8,526,546, 8,787,275, and 8,077,594 (collectively, the “Dropped Patents”). IP Bridge does not oppose.

IP Bridge contends that certain operations described in 3GPP Technical Specifications require practice of these patents. Specifically, IP Bridge contends that the ’546 Patent is practiced when an LTE base station receives a PUCCH format 2a or format 2b message. IP Bridge contends that the ’275 Patent is practiced when an LTE or 5G NR base station sends DCI messages using cross-carrier scheduling. IP Bridge contends that the ’594 Patent is practiced when an LTE base

station receives both an SRS and a RACH preamble in the same subframe. Collectively, these are the “Accused Features.”

Ericsson notified IP Bridge that its products do not implement the Accused Features, and provided citations to source code and supporting documentation establishing that Ericsson’s current and past products did not support the Accused Features. Ericsson understands and agrees that any later-developed product with any of the Accused Features would not be “essentially the same” as the Accused Products in this litigation as to the particular Dropped Patent even if the product bears the same name or product number as an Accused Product in this litigation. Subject to that agreement, and based on the evidence provided by Ericsson, IP Bridge agreed to dismiss its claims as to the ’546, ’275, and ’594 Patents with prejudice.

Accordingly, Ericsson respectfully requests the Court dismiss IP Bridge’s Second, Fourth, and Sixth causes of action from its original complaint (Dkt. No. 1) with prejudice. Ericsson also requests the Court dismiss its Second, Fourth, and Sixth counterclaims (Dkt. No. 18) without prejudice.

Dated: April 7, 2022

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**ATTORNEYS FOR DEFENDANTS
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on April 7, 2022.

/s/ Nicholas Mathews

Nicholas Mathews

CERTIFICATE OF CONFERENCE

I hereby certify that that counsel for all parties have conferred and the relief sought herein is unopposed.

/s/ Nicholas Mathews

Nicholas Mathews